

# Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DEMOCRATIC NATIONAL COMMITTEE,	)	
	)	
Plaintiff,	)	Civil Action No. 1:18-cv-03501-JGK
	)	
v.	)	
	)	
THE RUSSIAN FEDERATION et al.,	)	
	)	
Defendants.	)	
	)	
	)	

**DECLARATION OF JOSEPH M. SELLERS:**

I, Joseph M. Sellers, declare as follows:

1. I am a partner at Cohen Milstein Sellers & Toll, PLLC. I am counsel for Plaintiff in the above-referenced matter. I submit this declaration in connection with Plaintiff's Status Report Regarding Service of Process. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.
2. Immediately after filing the complaint in this action, Plaintiff began efforts to serve each of the 15 Defendants named in this action.
3. Within 10 days of filing the Complaint, Plaintiff's counsel called attorneys who reportedly represented the Non-Waiving Defendants in other matters.
4. On April 30, 2018, Geoffrey Graber and I left voicemail messages with Thomas Green, who reportedly represented Gates, Abbe Lowell, who represented Kushner, and Kevin Downing, who reportedly represented Manafort, but those messages were not returned.
5. That same day, Mr. Graber and I called Scott Balber, who confirmed that he represents both Emin Agalarov and his father in other matters. Mr. Balber said that he was not authorized to

accept service on behalf of the Agalarovs. When Mr. Graber and I asked if Mr. Balber could identify anyone else who might be authorized to accept service for the Agalarovs, Mr. Balber instructed Plaintiff's counsel to consult "the Federal Rules."

6. Also on April 30, 2018, Mr. Graber and I contacted Barry Pollack, Assange's criminal defense attorney. Mr. Pollack confirmed that he represents Assange in the criminal matter under investigation by the Office of the Special Counsel. Mr. Graber and I asked Mr. Pollack if he could accept service for Mr. Assange. Mr. Pollack responded that he was not authorized to accept service in a civil matter for Mr. Assange, and that he could not identify anyone else in the United States who is authorized to accept service.

7. On June 13, 2018, Plaintiff attempted to serve Emin Agalarov at an address on Anderson Avenue in New Jersey, which had been described as Emin Agalarov's home in news stories.

8. On June 29, 2018, Mr. Balber, Emin Agalarov's attorney, contacted me by phone to say that Emin Agalarov contests the sufficiency of service at the New Jersey address. According to Mr. Balber, Emin Agalarov's sister—rather than Emin Agalarov himself—lives in the New Jersey house and Ms. Madzule is his sister's housekeeper. Mr. Balber further claimed that Ms. Madzule does not speak English and therefore did not qualify as a person of "suitable age and discretion," capable of accepting service under Federal Rule of Civil Procedure 4(e)(2)(B). Mr. Balber acknowledged that Mr. Agalarov was aware of the complaint naming him as a defendant.

9. On July 10, 2018, Plaintiff sent Mr. Balber a letter explaining that service under the Federal Rules was effectuated on June 13, 2018, when the process server delivered the package to Ms. Madzule. Mr. Balber responded to this letter by emailed letter the next day, confirming that he represents Mr. Agalarov in connection with this case, but disagreeing with Plaintiff's analysis and

stating, among other things, that Emin Agalarov could not be served in New Jersey because he is a resident of Moscow.

10. As to Mr. Kushner, because his home in Washington, D.C. is protected by a contingent of United States Secret Service agents, Plaintiff's counsel first requested that the process server attempt to serve Kushner at an address in Manhattan that had been listed as one of Kushner's addresses in publicly available sources.

11. Immediately after receiving the Court's July 17, 2018 Order regarding Mr. Kushner, Plaintiff's counsel renewed their efforts to contact Mr. Lowell, who was reported to represent Kushner in another matter. By email dated July 18, 2018, Mr. Lowell agreed to accept service on behalf of Kushner. That night, Plaintiff's counsel sent a courier to Mr. Lowell's office to deliver Kushner's service packet. Plaintiff's counsel also emailed a copy of the service packet to Mr. Lowell.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of July 2018 in Washington, D.C.

A handwritten signature in black ink, appearing to read "Joe Sellers", written over a horizontal line.

Joseph M. Sellers